

January 12, 2017

Via ECF

The Honorable James Orenstein
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: Hayes v. Talib et. al.
Docket number: 16-CV-2866(FB)(JO)
LJAA File No.: 290-1007

Dear Judge Orenstein:

This office represents defendants Amin Talib and Harris-Camden Terminal Co. in the above referenced matter. I write on behalf of and with the consent of all parties to request a 60 day extension of the dates in the current discovery schedule. This is the first request for an extension.

Please recall that after the Initial Conference in this matter, pursuant to a So-ordered Stipulation, plaintiff amended the complaint on or about October 18, 2016 to add defendants Glaser Escorts, Teresa Blease and Zain Qaiser. These parties have now answered and their counsel, Conrad Blease, has been admitted *pro hac vice* and filed his Notice of Appearance on December 1, 2016.

Please be advised that Mr. Blease has been out of the country since December 26, 2016, and will not return until January 23, 2017. Accordingly, the parties request the dates in the Case Management and Scheduling Order issued by Your Honor on July 20, 2016 be extended 60 days as follows:

Proposed Amended Discovery Schedule:

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| 1. Deadline for Rule 26(a)(1) disclosures by defendants
Glaser Escorts, Blease and Qaiser due: | February 9, 2017 |
| 2. First request for production of documents
and first request for interrogatories due: | February 9, 2017 |
| 3. Status Conference (with joint status report due
two business days in advance): | March 31, 2017 |

Mark R. Aledort
Robert J. Avallone
Deborah A. Aviles
Amy E. Bedell
Karen M. Berberich
Claudia L. Boyd
Julianne Bonomo
Anne M. Bracken
Dylan C. Braverman
Brian Brown
Jorja C. Carr
Joseph M. Charchalis
Robert J. Cimino
Michael T. Colavecchio
Robert M. D'Angelillo
Thomas J. Dargan
Tara M. Darling
Rebecca K. Devlin
Amanda C. Dickens
Robert W. Doyle, Jr.
Rosa M. Feeney
David W. Fink
Daniel K. Fichtelman
Carl A. Formicola
Jennifer M. Frankola
Lawrence J. Freeze
Stacey E. Gorny
Brian J. Greenwood
John J. Halleron III
Christine B. Hickey
Tara M. Higgins
Caroline K. Hock
John E. Horan
Jeffrey D. Hummel
Frederick C. Johs
Annemarie S. Jones
Jason T. Katz
Jessica Klotz
Peter L. Kramer
Bryan F. Lewis
William J. Lewis
Eileen H. Libutti
Robert A. Lifson
Judith N. Littman
Stephen J. Maloney, Jr.
Daniel W. McCally
Kevin G. Mescall
David L. Metzger
Michael Milchan
Greg M. Mondelli
James F. Murphy
Megan M. Murphy
Teresa M.C. Myers
Jordan S. Palatiello
Amy S. Pincus
Jeffrey M. Pincus
Ross A. Ruggiero
Thomas A. Rhatigan
E. Sean Rooney
Martin K. Rowe
John B. Saville
Ellen N. Savino
Theresa Scotto-Lavino
Matthew D. Shwom
Adam H. Silverstone
Amanda E. Spinner
Nicholas A. Spratt
Paul R. Varriale
Robert J. Yenchman

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| 4. Fact discovery to be completed by: | May 19, 2017 |
| 5. Plaintiff's expert reports to be completed by: | June 19, 2017 |
| 6. Defendants' expert reports to be completed by: | July 18, 2017 |
| 7. All discovery, including all expert disclosures under Rule 26(a)(2), if any, to be completed by: | August 21, 2017 |
| 8. Pretrial Conference (<i>ex parte</i> statements of settlement position due via email two business days in advance): | September 13, 2017 |
| 9. Dispositive motion process started by: | September 18, 2017 |
| 10. Joint pretrial order due by: | October 16, 2017 |

Thank you for your time and consideration.

Very truly yours,

/s/

Jessica Klotz
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Islandia Office
JK:ll

cc via ECF: Eric Subin, Esq.
Conrad Blease, Esq.